

**BASIS FOR SAMPLE LOCATIONS IN TABLE 1 OF CRA PROPOSAL DAYTON
POWER & LIGHT FACILITY - MORaine, OH**

Sample Location	Basis
Stores Department/Service Building	Jim South worked for Stores Department which had the duty of loading and driving the dump truck staged along the west dock of the Service Building. See South April 26, 2012 deposition on pp. 30-31 and Exhibit 1 to South Deposition. South drove the dump truck from the Service Building across Springboro Pike into the driveway that led to the dump. Dep. at 36. The driveway was directly across Springboro Pike from entry into the Service Building. Dep. at 59, as marked on Ex. 1 to South Dep. Jim Tharpe identified in his January 17, 2012 deposition on pp. 50-51 as, driving into the dump from an entrance that was almost across the street from DP&L.
West Dock	Jim South identified in his April 26, 2012 deposition on p. 39, as marked on Ex. 2, as parking the dump truck, "at the south end of the west dock."
East Dock	Jim South identified in his April 26, 2012 deposition on p. 118 the Underground Cable Department, "located on the east dock...right behind the Oil House." South identified in his deposition on p. 119 as the Underground Department having their own trucks, possibility including "Fuller's Earth" and degreaser sludge. South identified "Fuller's Earth" in his deposition on pp. 101-103, "as a white sand filter used in the Oil House." Jim Tharpe identified the "Underground Department," in his January 17, 2012 deposition p. 21, "a lot of guys would stop there and get gas in their trucks. Or if they would park them at night we went around and checked them made sure the oil was right and the gas was right."
Transportation Department	The Transportation Department was likely to have degreasers, will confirm in future depositions. See Ex. 1, 7 of South Dep. for location of Transportation Department.
Oil House	Jim South identified in his April 26, 2012 deposition pp 89-90, the Oil House as being located "behind the Service Building, on the east side of the Service Building." See Ex. 2, 5, 6 to South Dep. South identified a "clean out" along the east wall of the Oil House, in his deposition on p. 101 as, "a plate you can take off to clean the filters in and out of the Oil House." South identified in his deposition "Fuller's Earth" on pp. 101-102 as a filtration sand for transformer oil that contained PCBs. Jim Tharpe identified the Oil House in his January 17, 2012 deposition p. 83, "that's where the new oil came in and was put in the tanks. That's where the pumps were at. They had a filter system in there. They'd bring oil in out of transformers out in the field, the big transformers, run it through the filters, clean it, degasify it, take it out, put it in the substation transformers." Tharpe states that, "at one time it was PCB oil."

Transformer Repair Shop	Jim South identified in his April 26, 2012 deposition on pp. 104-105 the Transformer Shop Department as the department that "shoveled the oil cleanout into a little box." South stated in his deposition on p. 116 that the employees in the Transformer Repair Shop using "paint guns." See Ex. 2 of South Dep. for location of Transformer Shop. Jim Tharpe identified in his January 17, 2012 deposition p. 82, there was a, "transformer dismantling house at the Service Building."
Machine Shop	Jim South identified the Machine Shop in his April 26, 2012 deposition on p. 123 as being located "behind the Transformer Repair Shop." See Ex. 2 of South Dep. for location of the Machine Shop. South identified in his deposition on p. 122, as the Machine Shop no longer being at the Service Building.
Fly Ash Dump	Jim South identified in his April 26, 2012 deposition on pp. 128-129 as the location of the Tait Station, "used to dump fly ash and bottom ash and slag in." See Ex. 1 of South Dep. For location of Fly Ash Dump and Tait Station.
Gas Operations Regulator Shop	Identified degreasing equipment, solvent usage and painting in DP&L_0004582, attached. South identified on pp. 125- 126 of his deposition, the Gas Operations Regulator Shop located, "on the west dock, north end of the west dock."
Gas Meter & Measurement Department	Identified degreasing equipment, solvent usage and painting in DP&L_0004585, attached. Jim Tharpe identified in his January 17, 2012 deposition p. 72 that the Meter Shop was a department in the Service Building, and that they would "threw any materials into Ford Truck," that sat outside the Service Building. South identified the Gas Meter and Measurement Department on p. 127 of his deposition, being located on the north end of the west dock.